

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
CASE NO. 1:22-cr-00312-DLC-2

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATTHEW TAYLOR WITKOWSKI,

Defendant.

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**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE TO ALLOW FOR  
TEMPORARY TRAVEL**

COMES NOW the Defendant, MATTHEW TAYLOR WITKOWSKI, by and through the undersigned counsel, moves this Honorable Court to modify his conditions of release to allow for temporary travel, and states the following as grounds thereof:

1. On November 4, 2021, during the Defendant's Arraignment before Magistrate Judge Kimberly C. Priest Johnson, the Defendant was granted bond and placed on Conditions of Release.
2. The special conditions of the Defendant's release included a Location Monitoring Program which included home confinement; that he must surrender all passports and travel documents; that he must report to Pretrial Services as directed; that he must refrain from possessing a firearm; and the prohibition to travel outside of the Southern District of Florida, nor the ability to commercial transportation establishments.

3. The Defendant was released on bond and has abided by all standard and special conditions of his release since.
4. Undersigned counsel has conferred with Assistant United States Attorney David Lewis, and the Defendant's Probation Officer Jason Jacoby, who have both given no objection to the Defendant's Motion to Modify Conditions of Release to Allow for Temporary Travel.
5. Undersigned counsel requests that the Defendant is allowed to travel on Thursday, January 5<sup>th</sup>, 2023, to take an excursion with his wife and three children at East Las Olas Boulevard, Fort Lauderdale, Florida from 2:00p.m.-6:00p.m.

WHEREFORE, the Defendant prays this Honorable Court grants this reasonable request to Modify Conditions of Release to Allow for Temporary Travel.

Respectfully submitted,

SAAM ZANGENEH, P.A.  
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/s/ Saam Zangeneh  
By: Saam Zangeneh, Esq.  
Fla. Bar No.: 526721

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Unopposed Motion to Modify Conditions of Release has been electronically filed this 4th day of January, 2023.

/s/ Saam Zangeneh  
By: Saam Zangeneh, Esq.  
Fla. Bar No.: 526721